



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 22 2016

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7677 8053
RETURN RECEIPT REQUESTED

Mr. Ken Ebersole
Manufacturing Engineer
ASTEC Mobile Screens, Inc.
2704 West Lefevre Road
Sterling, Illinois 61081

Re: Notice of Violation
Compliance Evaluation Inspection
ILR000064832

Dear Mr. Ebersole:

On May 12, 2016 a representative of the U.S. Environmental Protection Agency inspected the ASTEC Mobile Screens, Inc. facility located in Sterling, Illinois (ASTEC). As a large quantity generator of hazardous waste, ASTEC is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate ASTEC's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by ASTEC, EPA's review of records pertaining to ASTEC, and the inspector's observations, EPA has determined that ASTEC has unlawfully stored hazardous waste without a permit or interim status as a result of ASTEC's failure to comply with certain conditions for a permit exemption under Ill. Admin. Code tit. 35 § 722.134(a)-(c) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which ASTEC was out of compliance at the time of the inspection in paragraphs 1 – 3 below.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption conditions identified in paragraphs 2 - 3 are also independent TSD requirements

incorporated from Ill. Admin. Code tit. 35 Part 725. Accordingly, each failure of ASTEC to comply with these conditions is also a violation of the corresponding requirement in Ill. Admin. Code tit. 35 Part 725 [40 C.F.R. Part 265].

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS

At the time of the inspection, ASTEC was out of compliance with the following large quantity generator permit exemption conditions:

1. Hazardous Waste Container Labeling

Under Ill. Admin. Code tit. 35 § 722.134(c)(i) [40 C.F.R. § 262.34(c)(1)(ii)], a large quantity generator must label or clearly mark each satellite accumulation container holding hazardous waste with the words “Hazardous Waste” or other words that identify the contents.

At the time of the inspection, two 55-gallon drums used to hold paint-related hazardous waste in the satellite accumulation area were not labeled with the words “hazardous waste” or other content-identifying words.

The permit exemption conditions identified below in paragraphs 2 -3 are also independent TSD requirements violated by ASTEC:

2. Use and Management of Containers

Under IAC 35 §§ 722.134(a)(1)(A) and 725.273(a) [40 C.F.R. §§ 262.34(a)(1)(i) and 265.173(a)], a large quantity generator must always keep a container holding hazardous waste closed during storage, except when it is necessary to add or remove waste.

At the time of the inspection, ASTEC did not keep its two satellite accumulation containers, located in the paint booth, holding hazardous waste closed during storage and waste was not being added or removed to these two containers while they were open.

3. Amendment of Contingency Plan

Under IAC 35 §§ 722.134(d) and 725.152(d) [40 CFR 262.34(d) and 265.52(d)], a large quantity generator must amend its contingency plan (CP) when the list of emergency coordinators changes.

At the time of the inspection, Mr. Drew Bush was listed in two places in the CP as an emergency coordinator even though Mr. Bush had left the employment of ASTEC.

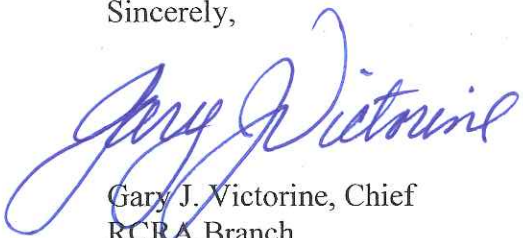
By failing to comply with the conditions for a permit exemption, above, ASTEC became an operator of a hazardous waste storage facility, and was required to obtain an Illinois hazardous waste storage permit. ASTEC failed to apply for such a permit. ASTEC's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ill. Admin. Code tit. 35 §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725 is also an independent violation of the corresponding TSD requirement.

At this time, EPA is not requiring ASTEC to apply for an Illinois hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraphs 1 - 3 above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions. You should submit your response to Robert Dean Smith, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Robert Dean Smith, of my staff, at (312) 886-7568 or at smith.robert@epa.gov.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois EPA, (todd.marvel@illinois.gov)



U. S. Environmental Protection Agency
Region 5, Land and Chemicals Division
RCRA Branch
77 West Jackson Boulevard
Chicago, Illinois 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: ASTEC Mobile Screens Inc.

EPA ID NUMBER: ILR000064832

ADDRESS: 2704 W. Lefevre Road
Sterling, Illinois 61081

DATE OF INSPECTION: May 12, 2016

EPA INSPECTOR: Robert Dean Smith, LPG
Environmental Scientist

PREPARED BY:

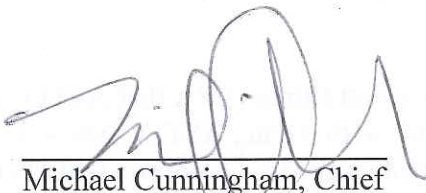


Robert Dean Smith, LPG
Compliance Section 1

06/27/2016

Date

APPROVED BY:



Michael Cunningham, Chief
Compliance Section 1

6/27/16

Date

Purpose of Inspection

This inspection was an evaluation of ASTEC Mobile Screens, Inc.'s (ASTEC) compliance with hazardous waste, used oil, and universal waste regulations found at 35 Illinois Administrative Code (IAC) and the Code of Federal Regulations (CFR). The inspection was a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI). The site notified as large quantity generator (LQG).

Participants

Inspector:

Robert Dean Smith, LPG, EPA

ASTEC Representatives:

Tom Gonigam, President

Ken Ebersole, Manufacturing Engineer

Regina Thompson, Administrative Assistant, HR Manager/Safety Coordinator

Claudio Palmer, Plant Manager

Introduction

On May 12, 2016, I arrived at the site at approximately 10:00 AM. I introduced myself, presented my inspector credentials, business card, and described the purpose and process by which I intended to conduct the inspection. Mr. Ebersole and Ms. Thompson provided me with a description of the site operations and provided me with the records I requested for review. Mr. Ebersole led the tour.

I informed Mr. Ebersole that ASTEC could claim any information gathered during the inspection as Confidential Business information including: verbal information, documents and photographs. ASTEC did not make a CBI claim on the information gathered during the inspection.

Initially, Messrs. Ebersol and Gonigam were away from the facility attending a meeting. Ms. Thompson provided me with documents to review.

Site Description

On August 24, 2015, ASTEC notified Illinois EPA that ASTEC moved into the LQG category of hazardous waste generation. Prior to that date, ASTEC was a Small Quantity Generator (SQG). I was informed by both Mr. Ebersole and Ms. Thompson that ASTEC had two catastrophic pump failures and process materials were ruined and had to be disposed of as hazardous waste. As a result, ASTEC entered into an agreement with AMEC Foster Wheeler, Peoria, Illinois, to assist ASTEC into compliance with LQG regulations. AMEC informed ASTEC that "on two occasions, ASTEC exceeded the threshold of 1000 kg/month generation of hazardous waste" and thus entered into the LQG category of hazardous waste generation.

ASTEC manufactures road construction equipment and serves the mining industry as well. The machines I saw on site were the tracked vehicles that grind asphalt off of roads and conveys the cuttings into receptacles, such dump trucks or 18-wheeler trucks. The machines run on caterpillar tracks that are obtained from Ireland. With exception of a few components, such as engines and

the caterpillar tracks, the machine components are manufactured and assembled onsite. ASTEC manufactures approximately 75 of the machines each year.

ASTEC is a 40 year old company and has been at the 65,000 square foot facility since 1999. ASTEC has 105 employees at this facility. There have been some layoffs but the construction season usually increases production. ASTEC depends on the road construction bills that provide work for a variety of industries including their own.

ASTEC generates paint waste and paint filters, waste acids, spill cleanup materials, and universal waste bulbs.

Site Tour

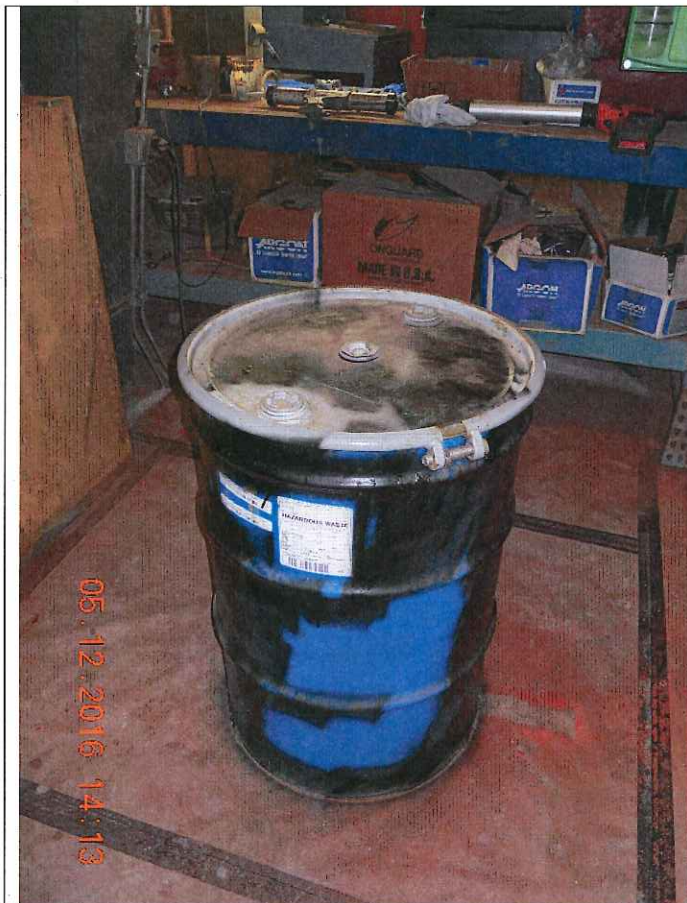
I observed facility operations including satellite accumulation areas, the less-than 90-day accumulation containers and emergency equipment. I took photographs of the various waste operations and waste storage/accumulation areas during the site tour.



Picture #: 1

Location: Hazardous waste locker

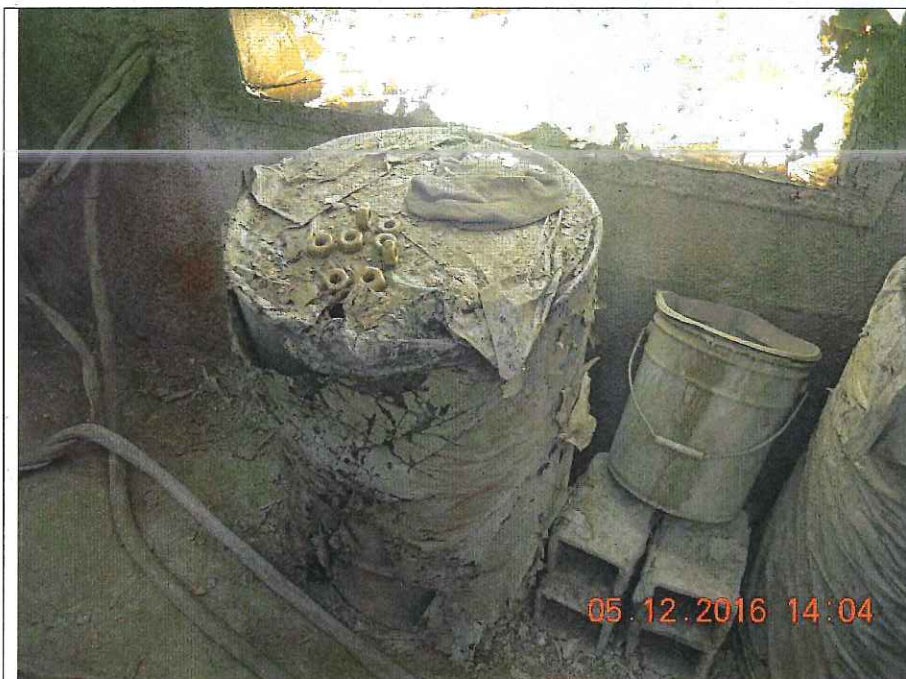
Subject: One drum of hazardous waste was in storage at the time of the inspection. This photograph is of that drum. The drum on top of this drum is an empty drum. The drum is labeled, dated and stored closed.



Picture #: 2

Location: Satellite Accumulation area.

Subject: Drum of hazardous waste that is labeled and stored closed.



Picture #: 3

Location: Spray booth

Subject: Drum of hazardous waste in satellite accumulation. The drum is covered in plastic to keep the drum clean. The drum is not marked with words that identify the waste and the bung is not in the drum.



Picture #: 4

Location: Paint booth

Subject: Satellite accumulation drum that is covered with plastic in order to keep the drum clean. The drum is not labeled with words that describe the contents and a plastic bottle is in the bung acting as a funnel. The drum is open.

We started the site tour at the paint booth where I observed two satellite accumulation containers. The containers were 55-gallon drums that were covered with plastic in order to protect the containers from overspray (Photographs 3 and 4). The plastic covers were covered with overspray paint. I observed that neither satellite drum was labeled or marked in any way which indicated the contents of the drum. I observed that neither drum was closed. One drum had no bung cover in place and the other drum had a cut-down beverage bottle in the bung which acted as a funnel. I stated that the drums need to be labeled with its contents and the drums need to be closed.

We walked out of the paint booth to an area where another satellite drum was located. The drum had just been filled and removed from the paint booth. The drum was labeled, marked and dated (Photograph 2). The drum had not been in place for over 3 days.

We walked out the building to the less than 90 day hazardous waste accumulation area. The storage area is a small storage shed. I observed one drum of hazardous waste within the storage shed. The drum was labeled, marked, dated and stored closed. An empty drum was placed on top of the drum (Photograph 1).

We walked to a storage area where drums of solid waste were in storage. Some of the solid waste drums were marked as hazardous waste and some were not marked as hazardous waste. I had earlier reviewed the hazardous waste determinations and I observed that two waste determinations were made one day apart from each other. As explained in the paperwork section, Mr. Ebersole stated that initially the waste was characterized as a hazardous waste by the

consultant but Mr. Ebersole believed the waste was not hazardous and the waste was reanalyzed and was found to be non-hazardous. The drums I observed were the group of waste paint chips that are characterized as a non-hazardous waste. Some of the drums observed had not yet been relabeled as a non-hazardous waste.

We left the solid waste area and walked into the office area to conduct the closing conference.

Records Review

Hazardous Waste Determinations

I reviewed waste profiles/characterizations, waste analysis records, manifests, land disposal restriction notifications (LDR), weekly container inspection logs, and the contingency plan. I completed a LQG checklist during the records review, *see* Attachment A.

Waste Stream and Accumulation Unit	Waste Codes	Generation Rate	Source of profile/hazardous waste determination
Paint waste	D001, F005	Various, appears to be between 350 to 400 kg/mo.	Safety Kleen
Waste Paint	D001, F005	Various, generation rate added to above waste stream	Safety Kleen
Spill Clean-up, oily waste	n/a	Various	Safety Kleen
Grease, oily water	n/a	Various	Safety Kleen
Paint chips	n/a	Various	Safety Kleen Note: This waste was re-evaluated as a non-hazardous waste

Hazardous waste manifests

I conducted a careful review of the hazardous waste manifests. One of my objectives was to determine to the extent possible, the accurate hazardous waste generator class that ASTEC falls into. I observed that, with the exception of the manifests that are connected to the two pump failures, the shipments were less than 1000 kg and the shipments were approximately on a monthly basis.

Manifest Number	Date Generator signature Date TSDF signature	Pounds/KG of Hazardous waste (total)
005258905 SKS	4/7/16 4/24/16	1,167 P / 530 KG
005258715 SKS	3/4/16 3/21/16	1,291 P / 586 KG
005131519 SKS	1/15/16	1,831 P / 832 KG

	2/5/16	
005131943 SKS	12/03/15	1,300 P / 590 KG
005079090 SKS	11/18/15 12/4/15	900 P / 409 KG
005079459 SKS	10/1/15 10/27/15	1,200 P / 545 KG
005019093 SKS	8/27/15 9/18/15	1,500 P / 681 KG
005019140 SKS	7/29/15 8/24/15	1,000 P / 454 KG
004843887 SKS	6/26/15 7/15/15	700 P / 318 KG
004809467 SKS	5/19/15 6/2/15	1,500 P / 681 KG
004809206 SKS	4/24/15 5/7/15	3,750 P / 1,704 KG
004708624 SKS	3/11/15 3/16/15	3,800 P / 1,727 KG
004529494 SKS	12/31/14 1/14/15	5,500 P / 2,500 KG
004587145 SKS	10/23/14 11/5/15	2,200 P / 1000 KG
004418574 SKS	8/28/14 9/9/14	2,800 P / 1,273 KG

I observed that after the shipment on manifest number 004809467, ASTEC shipments appeared to be less than a generation rate of 1000 kg/month.

Annual Report

I reviewed the latest Annual Report which was submitted to IEPA on 2/16/16. The Annual Report identified ASTEC as a LQG. ASTEC generated and shipped 16,140 pounds of hazardous waste in 2015. I observed no issues.

Contingency Plan

I reviewed the Contingency Plan (CP). The CP is dated July 21, 2015 and was authored by AMEC. I observed that the CP is detailed and contains the essential elements outlined in the RCRA regulations. I observed that Drew Bush is identified as the EHS Manager and as an emergency coordinator. Upon entry into the facility, I was informed that Mr. Bush had left employment with ASTEC a month or two before my inspection.

Arrangements with Emergency Authorities

ASTEC has agreements with 8 different emergency authorities. ASTEC submitted the CP to these authorities.

Employee training

The employee training program is found in the three ring binder that AMEC created. I noted that the training program contained the essential components identified in the RCRA regulations. Employee training had been conducted by ASTEC.

Inspections

ASTEC is conducting weekly inspections of its hazardous waste storage area.

Closing Conference

I stated that it appears that ASTEC is once again a SQG according to my review of the hazardous waste manifests. I stated that Drew Bush needs to be removed from the CP in two places as he is no longer employed by ASTEC. I stated that the two satellite accumulation drums need to be stored closed and labeled with words identifying the contents. I stated that I would review my notes when back at the office to see if there were any other issues not identified in the conference.

Attachment

A. Checklist

ATTACHMENT A

Inspection Checklist

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.)	
	SUBPART A: GENERAL	
722.111	Section 722.111 Hazardous Waste Determination Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	808.121(a)
722.112(a)	Section 722.112 USEPA Identification Numbers Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	SUBPART B: THE MANIFEST	
722.120(a)	Section 722.120 General Requirements Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.120(b)
	Section 722.121 Acquisition of Manifests	722.120(d)
722.121(a)	Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	- an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.121(b)
722.122	Section 722.122 Number of Copies Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
722.123(a)	Section 722.123 Use of the Manifest For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
	- retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.123(c)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PRE-TRANSPORT REQUIREMENTS	
722.130	Is there any hazardous waste ready for transport off-site? Yes _____ No _____ N/A _____	722.130
	If so, is the generator complying with the pre-transport requirements in Subpart C? Yes _____ No _____ N/A _____	
(722.134(a))	Section 722.134 Accumulation Time Has the generator complied with the following requirements: Yes _____ No _____ N/A _____	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? <i>in storage</i> Yes <input checked="" type="checkbox"/> No _____ N/A _____	
	and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
	and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
	and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? <i>2 satellite containers not closed</i> Yes _____ No <input checked="" type="checkbox"/> N/A _____	
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes _____ No _____ N/A _____	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:	
	Does the facility accumulate hazardous waste in containers? <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No _____ N/A _____	
	If "No", go to Subpart J.	
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
(725.211)	Has the generator closed an accumulation area? Yes _____ No <input checked="" type="checkbox"/> N/A _____	725.211
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.272)	Is the waste compatible with the container and/or liner? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? <i>2 satellite containers not closed, outside satellite areas the drums are stored closed</i> Yes _____ No <input checked="" type="checkbox"/> N/A _____	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <input checked="" type="checkbox"/> No _____ N/A _____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	<p>Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.276)	<p>Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.</p>	
(725.277)	<p>Is the owner/operator complying with the requirements concerning incompatible wastes? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>COMMENTS: 2 satellite container were not labeled as they were they closed. The drum in storage and the drum ready to be moved into 290 accumulation were labeled and closed.</p>	
(725.278)	<p>Section 725.278 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p> <p>Does the generator accumulate and/or treat hazardous waste in tanks? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: If "No", go to Subpart C.</p> <p>SUBPART J: TANK SYSTEMS</p> <p>Has the generator closed an accumulation area? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the facility accumulate or treat hazardous waste in tanks? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	
(725.211)		725.211
(725.214)		725.214
(725.290)		

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291(a))	For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes _____ No _____ N/A _____	
(725.291(b))	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the wastes? Yes _____ No _____ N/A _____ 3) existing corrosion protection measures? Yes _____ No _____ N/A _____ 4) documented age of the tank system? Yes _____ No _____ N/A _____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A _____ *IRPE = Independent Registered Professional Engineer	
(725.291(c))	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A _____ Note: If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292(a))	For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes _____ No _____ N/A _____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A _____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A _____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A _____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A _____	
(725.292(g))	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____ N/A _____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service? Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes _____ No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes _____ No _____ N/A _____</p> <p>or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A _____</p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes _____ No _____ N/A _____</p>	
(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <ol style="list-style-type: none"> compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes _____ No _____ N/A _____ placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift? Yes _____ No _____ N/A _____ provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes _____ No _____ N/A _____ sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes _____ No _____ N/A _____ <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A _____</p> <p>Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <ol style="list-style-type: none"> a liner (external to the tank); or a vault; or a double-walled tank; or an equivalent device (approved by the Board)? <p>Yes _____ No _____ N/A _____</p>	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) Are welded flanges, joints and connections inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)?</p> <p>Yes _____ No _____ N/A _____</p> <p>Note: If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	
(725.294(a))	<p>Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(b))	<p>Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including:</p> <p>1) spill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) overfill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) sufficient freeboard in uncovered tanks?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(c))	<p>Note: If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.</p>	
(725.295(a))	<p>Does the owner/operator inspect, if present, at least each operating day, the following:</p> <p>1) overfill/spill control equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) the aboveground portion of the tank system for corrosion or releases?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) data from monitoring equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) the construction materials and the area immediately surrounding the external portion of the system?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(b))	<p>If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(c))	<p>Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)?</p> <p>Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	<p>If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:</p> <p>a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A _____</p> <p>b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A _____</p> <p>c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A _____</p>	
(725.296(d))	<p>d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A _____</p> <p>d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A _____</p> <p>Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.</p>	
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes _____ No _____ N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes _____ No _____ N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes _____ No _____ N/A _____</p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes _____ No _____ N/A _____</p> <p>Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes _____ No _____ N/A _____</p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____ N/A _____</p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes _____ No _____ N/A _____</p> <p>Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system? Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:</p> <ul style="list-style-type: none"> - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes _____ No _____ N/A _____ - Section 725.117(b) is complied with? Yes _____ No _____ N/A _____ <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies? Yes _____ No _____ N/A _____</p>	
(725.298(b))	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes _____ No _____ N/A _____</p>	
(725.299)	<p>Are incompatible wastes/materials placed in the same tank? Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with? Yes _____ No _____ N/A _____</p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes _____ No _____ N/A _____</p> <p>COMMENTS:</p>	
(725.302)	<p>Section 725.302 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A _____</p> <p>Comments:</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.131)	SUBPART C: PREPAREDNESS AND PREVENTION Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes _____ No _____ N/A _____	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No _____ N/A _____ b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No _____ N/A _____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No _____ N/A _____ d) water at adequate volume and pressure for fire control? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No _____ N/A _____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - agreements designating the primary authority where more than one police or fire department might respond? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - agreements with State emergency response teams, contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
(725.151(a))	Is the contingency plan available? Yes <input checked="" type="checkbox"/> No _____ N/A _____ If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes _____ No <input checked="" type="checkbox"/> N/A _____ If "Yes", has the contingency plan been carried out immediately? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - explosions? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - releases? Yes <input checked="" type="checkbox"/> No _____ N/A _____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152(c))	<p>Does the plan describe arrangements with:</p> <ul style="list-style-type: none"> - police and fire departments? Yes <u> / </u> No <u> </u> N/A <u> </u> - hospitals? Yes <u> / </u> No <u> </u> N/A <u> </u> - contractors? Yes <u> / </u> No <u> </u> N/A <u> </u> - emergency response teams? Yes <u> / </u> No <u> </u> N/A <u> </u> 	
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address? <i>note below</i></p> <p>Yes <u> </u> No <u> </u> N/A <u> </u></p>	
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <ul style="list-style-type: none"> - description? Yes <u> / </u> No <u> </u> N/A <u> </u> - capability? Yes <u> / </u> No <u> </u> N/A <u> </u> - location? Yes <u> / </u> No <u> </u> N/A <u> </u> <p>Is the list of emergency equipment up-to-date?</p> <p>Yes <u> </u> No <u> </u> N/A <u> </u></p>	
(725.152(f))	<p>Does the plan include:</p> <ul style="list-style-type: none"> - an evacuation plan? Yes <u> / </u> No <u> </u> N/A <u> </u> - an evacuation signal? Yes <u> / </u> No <u> </u> N/A <u> </u> - alternate evacuation routes? Yes <u> / </u> No <u> </u> N/A <u> </u> 	
(725.153)	<p>Has the contingency plan (including all revisions) been:</p> <ul style="list-style-type: none"> a) maintained at the facility? Yes <u> ✓ </u> No <u> </u> N/A <u> </u> b) submitted to: <ul style="list-style-type: none"> - police department? Yes <u> / </u> No <u> </u> N/A <u> </u> - fire department? Yes <u> / </u> No <u> </u> N/A <u> </u> - hospital? Yes <u> / </u> No <u> </u> N/A <u> </u> - emergency response teams? Yes <u> / </u> No <u> </u> N/A <u> </u> 	
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <ul style="list-style-type: none"> a) regulations are revised? Yes <u> </u> No <u> </u> N/A <u> ✓ </u> b) the plan fails in an emergency? Yes <u> </u> No <u> </u> N/A <u> ✓ </u> c) the facility changes in a way that modifies the emergency response necessary? Yes <u> </u> No <u> </u> N/A <u> ✓ </u> d) information regarding emergency coordinators changes? Yes <u> </u> No <u> </u> N/A <u> </u> e) information regarding equipment changes? Yes <u> </u> No <u> </u> N/A <u> ✓ </u> 	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times? Yes <u> </u> No <u> </u> N/A <u> </u></p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes <u> ✓ </u> No <u> </u> N/A <u> </u></p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes <u> ✓ </u> No <u> </u> N/A <u> </u></p>	
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes <u> </u> No <u> </u> N/A <u> ✓ </u></p> <p>Note: If the facility has had a release, explain in detail.</p>	

→ note: Draw Bush still listed as primary, He left "in Nov '15"
 alternate is Claudio Palmer, who is still here and is the
 Plant Manager -
 This is the first CP. went from SQ6 → CQ6 last year.
 Appears they are a SQ6, again. Awaiting confirmation

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p>Section 725.116 Personnel Training</p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - key parameters for automatic waste feed cut-off systems? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - <i>As necessary</i> communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to fire or explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to groundwater contamination incidents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - shutdown of operations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? <i>not yet 1 year as LAG</i> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	<p>Section 728.107 Waste Analysis and Recordkeeping</p> <p>Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan?</p> <p>Yes _____ No _____ N/A _____</p> <p>Is the plan on-site?</p> <p>Yes _____ No _____ N/A _____</p> <p>Does the plan include a detailed physical and chemical analysis?</p> <p>Yes _____ No _____ N/A _____</p> <p>Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity?</p> <p>Yes _____ No _____ N/A _____</p> <p>Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site?</p> <p>Yes _____ No _____ N/A _____</p>	
722.134(c)	<p>Section 722.134 Satellite Accumulation</p> <p>Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
722.134(g)	<p>Note: A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.</p>	
	SUBPART D: RECORDKEEPING AND REPORTING	
722.140(a)	<p>Section 722.140 Recordkeeping</p> <p>Has the generator retained for a period of 3 years:</p> <ul style="list-style-type: none"> - a copy of each signed manifest? <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	722.140(a)
722.140(b)	<p>Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	722.140(b)
722.140(c)	<p>Has the generator retained for a period of 3 years:</p> <ul style="list-style-type: none"> - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	722.140(c)
722.140(d)	<p>Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	722.140(d)
722.141(a)	<p>Section 722.141 Annual Reporting</p> <p>Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.</p>	722.141(a)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
722.142(a)(1)	Section 722.142 Exception Reporting If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.141(b)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes _____ No _____ N/A _____	722.142(a)(1)
722.143	Section 722.143 Additional Reporting Has the generator furnished additional reports as required by the Director? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.142(a)(2)
722.150	SUBPART E: EXPORTS OF HAZARDOUS WASTE Is the generator an exporter of hazardous waste? Yes _____ No <input checked="" type="checkbox"/> N/A _____ If "Yes", has the generator complied with the requirements of Subpart E? Yes _____ No _____ N/A _____	722.143
722.160	SUBPART F: IMPORTS OF HAZARDOUS WASTE Is the generator an importer of hazardous waste? Yes _____ No <input checked="" type="checkbox"/> N/A _____ If "Yes", has the generator complied with the requirements of Subpart F? Yes _____ No _____ N/A _____	722.150
722.170	SUBPART G: FARMERS Is the generator a farmer? Yes _____ No <input checked="" type="checkbox"/> N/A _____ If "Yes", has the generator complied with the requirements of Subpart G? Yes _____ No _____ N/A _____ COMMENTS:	722.160
		722.170

